

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Promote Policy
and Program Coordination and Integration in
Electric Utility Resource Planning.

Rulemaking 04-04-003
(Filed April 1, 2004)

Order Instituting Rulemaking to Promote Consistency in
Methodology and Input Assumptions in Commission
Applications of Short-run and Long-run Avoided Costs,
Including Pricing for Qualifying Facilities.

Rulemaking 04-04-025
(Filed April 22, 2004)

**COMMENTS OF
THE CALIFORNIA COGENERATION COUNCIL
ON THE ALTERNATE PROPOSED DECISION
OF COMMISSIONER GRUENEICH**

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I. INTRODUCTION AND OVERVIEW

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California Cogeneration Council ("CCC") hereby submits these comments on the Alternate Proposed Decision of Commissioner Grueneich in the above-captioned proceedings ("Alternate PD"). The Alternate PD is, in many respects, a significant improvement over the original Administrative Law Judge's Proposed Decision ("Proposed Decision") and the CCC greatly appreciates the efforts that went into its preparation. Clearly, the concerns expressed by the CCC and other QF parties with the Proposed Decision were heard and considered. Notwithstanding the improvements, there remain six critical changes that need to be made to the Alternate PD.

First, although the Alternate PD correctly recognizes that NP-15 and SP-15 spot market prices do not reflect the utilities' short-run avoided costs ("SRAC") today, the Alternate PD still would rely on these market prices for fully one-half of the SRAC pricing determination. This places too much weight on these markets, which today account for only a small portion of the utilities' purchases and are, as the Alternate PD correctly points out, rife with inadequacies from an avoided cost standpoint. If the Commission desires to follow the methodology adopted in the Alternate PD for establishing the SRAC pricing formula (i.e., a blending of NP-15 and SP-15 market heat rates with the existing

administratively determined SRAC heat rates), the NP-15 and SP-15 values should be given less weight at the present time. The CCC proposes that the NP-15 and SP-15 values account for no more than one third of the SRAC formula, with the existing administrative values making up the difference.¹ To the extent that spot market prices better reflect SRAC prices in the future (e.g., as a result of MRTU implementation), the Commission could revisit these proportions.

Second, by employing the administrative SRAC heat rate values that are in effect today, the Alternate PD produces an irrational and unwarranted outcome in the SRAC formula for Southern California Edison Company ("SCE"). In particular, the Alternate PD states that the administrative heat rate for SCE should be 9,140 Btu/kWh, which was adopted on a temporary basis for SCE in Decision 01-03-067 but never updated despite the acknowledged need to do so. Aside from the legal flaws associated with using a number that needed to be, but never was updated, the resulting SRAC prices for SCE will be materially below the SRAC prices for both Pacific Gas and Electric Company ("PG&E") and San Diego Gas & Electric Company ("SDG&E"). Given the relative supply/demand balance and resource mixes in northern versus southern California, the record in this proceeding is clear that SRAC prices in SCE's territory should be higher on average than SRAC prices in PG&E's territory. In light of the foregoing, the CCC proposes that the Commission set SCE's administrative heat rate at 9,705 Btu/kWh, which is the simple average of the administrative heat rate employed by the Commission in SCE's SRAC payments in the 11 years since the Transition Formula became effective, i.e. from October 1996 through September 2007. This value is supported as a reasonable administrative SRAC heat rate for SCE by numerous other indicia of SCE's heat rate on the record in these proceedings.

Third, although acknowledging that the SRAC time of use ("TOU") factors that are currently in place for SDG&E and PG&E are outdated and in need of revision, the Alternate PD defers any consideration of new TOU factors to an unspecified future proceeding. Given the importance of TOU factors to the actual determination of the SRAC energy price, and in order to send correct price signals to QFs and promote generation when such generation is most needed for reliability purposes, it is

¹ As discussed below, this would result in SRAC heat rates for PG&E, SCE and SDG&E of 9,145, 9,155 and 9,086 Btu/kWh, respectively, for the month of May 2007 if the proportion were set at precisely one-third/two-thirds and the anomalous administrative heat rate for SCE were corrected.

imperative that the Commission adopt reasonable SRAC TOU factors along with the other adopted changes to the SRAC pricing formula. The CCC proposes that the Commission require the utilities to employ, on an interim basis, the updated TOU factors adopted by the Commission for energy efficiency and demand response programs, as proposed by the CCC, and revisit these interim TOU factors in the technical workshop that the Alternate PD requires within sixty days of the Commission's decision.

Fourth, in setting the burner-tip gas price to be used in PG&E's new SRAC formula, the Commission should employ PG&E City-gate prices (plus local transmission and distribution [T&D] charges) rather than a 50/50 mix of gas supplies at Topock and Malin (plus backbone and local T&D charges). This should be done because City-gate prices are much better indicators of gas prices actually being paid by electricity generators (and avoided by PG&E) than the arbitrary 50/50 mix of Malin and Topock gas. Using the City-gate prices can be done fully in compliance with Section 390(b).

Fifth, the Commission should increase the as-available capacity price to reflect a realistic capital cost for the combustion turbine ("CT") proxy. The Alternate PD would reduce the as-available capacity price in the Proposed Decision from \$59 per kW/year to \$32.50 per kW/year based upon claims from the utilities and others that the Proposed Decision understated the ancillary service value and energy rents that a modern CT likely could obtain in today's market. If the Commission is going to accept the argument that the Commission should look to current market expectations for the ancillary service value and energy rents, then the Commission must also look to current market expectations for the capital cost of the CT. The record and recent Commission decisions make clear that the CT capital costs included in the Alternate PD are outdated and understated. Based on a more realistic CT capital cost, the CCC recommends an as-available capacity price of \$64.77 per kW/year.

Sixth, the Commission should base the firm capacity price contained in the Alternate PD on the most recently adopted market price referent ("MPR"). The Alternate PD correctly bases the firm capacity price on the most up-to-date estimate of the fixed costs of a new combined-cycle gas turbine plant ("CCGT") capital costs, as adopted as part of the 2006 MPR. Commission staff recently published for comment the draft resolution for the 2007 MPR, which may be adopted as early as

September 20th. The 2007 MPR, which will almost certainly be adopted before the QF firm capacity contract is implemented, would best serve as the basis for CCGT fixed costs in the capacity price calculation. Using the values contained in the draft resolution and same methodology as contained in the Alternate PD, the firm capacity price would be \$155 per kW-year.

II. DISCUSSION

A. The Commission Should Reduce The Weight Given NP-15 and SP-15 Market Prices In The Market Index Formula To No More Than One Third.

The Alternate PD correctly concludes that NP-15 and SP-15 market clearing prices are not an appropriate measure of SRAC energy prices.² Among the reasons cited are that these prices "represent less than 5% of the total power purchased by the utilities, are easily manipulated and reflect only lower cost products" relative to QF power.³ In addition, the Alternate PD properly states that reliance on these prices would "ignore the existence of out of market purchases" and fail to reflect "the role that QFs play in reducing local market power."⁴ In sum, the Alternate PD correctly concludes that reliance on NP-15 and SP-15 market prices alone "would likely result in SRAC prices that understate utility avoided costs"⁵

Seeking to adopt an SRAC mechanism that is in accord with "the general evolution of QF pricing in the state, in which market-based factors will play an increasing role,"⁶ the Alternate PD adopts a "hybrid approach" that "combines a market derived heat rate value with the administratively determined approach adopted in prior Commission decisions."⁷ In particular, the Alternate PD adopts for the SRAC heat rate the simple average of (i) the heat derived from forward NP-15 and SP-15 market clearing prices and (ii) the heat rate embedded in the existing utility SRAC formulae.⁸ In so

² Alternate PD at 61-63.

³ Id. at 61.

⁴ Id.

⁵ Id. at 63.

⁶ Id. at 63-64.

⁷ Id. at 63.

⁸ Id. at 66. See below, however, for a failure of the Alternate PD's methodology with respect to SCE.

doing, without any justification based upon the record, the Alternate PD effectively weighs the NP-15 and SP-15 market-derived heat rates and the administratively derived heat rates equally (i.e., 50/50).

The CCC can support an approach that mixes the heat rates determined from market prices with those derived administratively, as does the Alternate PD. It is critical, however, to give appropriate weight in the SRAC pricing formula to each heat rate indicator. In light of all the flaws with today's NP-15 and SP-15 markets, many of which are referred to in the Alternate PD, an equal weighting between these market prices and the administratively determined values significantly overstates the relative weight that should be given to the market prices.

As mentioned above, among the reasons why the Alternate PD does not rely on NP-15 and SP-15 market clearing prices alone is the concern that these prices may be manipulated by the utilities: "[W]e are also reluctant to wholly embrace a proxy price based on a market over which the utilities themselves can potentially exert significant influence through their purchasing decisions and role as Scheduling Coordinators."⁹ This concern alone should be enough to make plain that, at the present time, an equal weighting between market prices and administratively determined prices is unwarranted. Even with market prices comprising 50% of the SRAC price, the utilities would have incentives to engage in strategic pricing behavior and could significantly affect QF prices in a manner that "is harmful to ratepayers and the overall energy market."¹⁰

In choosing the right proportion between market derived values and administratively determined values, the Commission should be guided by the underlying record and two basic principles. First, in light of all the flaws associated with the NP-15 and SP-15 market prices identified in the record, the adopted weighting should rely significantly more at this time on the administratively determined heat rates than on the NP-15 and SP-15 derived heat rates. Second, the combined SRAC heat rate that results from the adopted weighting should correspond to heat rate values that the record demonstrates are reflective of the utilities' avoided costs.

⁹ Id. at 62.

¹⁰ Id. at 63.

In light of the foregoing, a weighting of no more than one-third NP-15/SP-15 derived heat rates and at least two-thirds administratively determined heat rates is appropriate. Relying on NP-15 and SP-15 prices for a third of the SRAC heat rate formula, or less, would materially reduce the impact of utility gaming behavior and would better reflect that these prices are a very small fraction of the utilities' resource mix.

Were the Commission to employ a weighting of one-third NP-15/SP-15 derived heat rates and two-thirds administratively determined heat rates, the SRAC heat rates for PG&E, SCE and SDG&E would be 9,145 Btu/kWh, 9,155 Btu/kWh, and 9,086 Btu/kWh, respectively, for the month of May 2007.¹¹ These values are approximately 5 to 7 percent lower than the heat rate values proposed by the CCC and other QF parties in this proceeding,¹² and are consistent with the third-party derived heat rate measures cited in the record and derived from third-party data, including the California ISO's competitive market clearing prices ("CMCP") for 2002 and 2003 (which, contrary to the statement in the Alternate PD, were not derived using incremental energy price bids, but rather were determined from computer simulations of the entire CAISO grid) and the CEC's aging power plant study.¹³ These values also correspond to market heat rates adjusted to reflect the higher energy costs associated with reliability must-run (RMR) contracts, must-offer waiver denials (MOWD), and out-of-sequence/out-of-market (OOS/OOM) purchases, none of which are included in NP-15 / SP-15 market prices as the Alternate PD correctly reflects.¹⁴ Because QF generation is purchased under long-term contracts at set prices and QFs cannot exert local market power, QFs avoid these substantial energy-related intra-zonal congestion costs that are not included in NP-15 / SP-15 market prices or heat rates. These

¹¹ Note that this calculation assumes that the problematic SCE administratively determined heat rate of 9,140 Btu/kWh referenced in the Alternate PD is replaced with the 9,705 Btu/kWh value proposed by the CCC herein. The CCC has also used the 24-month SP-15 forward market heat rate of 8,055 Btu/kWh for May 2007 shown in Table 3 of the Alternate PD, plus the corresponding NP-15 forward market heat rate of 7,846 Btu/kWh.

¹² For example, the CCC recommended SRAC heat rates of 9,822 Btu/kWh for SP-15 and 9,620 Btu/kWh for NP-15. CCC/Beach, Ex. 102, at Table 7.

¹³ The 2002 – 2003 heat rates derived from the CAISO's statewide CMCP data were 9,153 Btu/kWh in 2002 and 9,196 Btu/kWh in 2003 (assuming \$2.50 per MWh in variable O&M). CCC/Beach, Ex. 102, at 31 and Table 4. The CCC's analysis of 2002 – 2003 system heat rates based on the CEC's aging power plant data shows system heat rates of 9,232 Btu/kWh in 2002 and 9,233 Btu/kWh in 2003. CCC/Beach, Ex. 102, at 31-34 and Tables 5 and 6.

¹⁴ QFs allow the IOUs to avoid these local reliability-related "intra-zonal congestion" costs, because many QFs are located in the midst of major load centers and the CAISO assumes that all QFs are operating in determining its local area reliability needs. CCC/Beach, Ex. 102, at 16-17. See also, Alternative PD at 61-62.

avoided out-of-market and other intra-zonal congestion costs can easily be shown to add at least 1,000 Btu/kWh to market heat rates.¹⁵ Finally, as reflected in the Alternate PD itself, these values reflect the low end of the spectrum of SRAC heat rates since the inception of the QF program, which "have been in the range of 9,000 to 10,000 Btu per kWh over the two decades of the California QF program."¹⁶

The Alternate PD envisions a transition to a greater reliance, perhaps even to full reliance on market-derived heat rates when MRTU is implemented.¹⁷ The CCC is prepared to keep an open mind. Jumping to a fifty percent weighting for the NP-15 and SP-15 derived heat rates at the present time, however, is improper and unsupported by the record. The CCC urges the Commission to recall that the PX was functioning well for more than three years and the Commission was on the verge, at the utilities' urging, of adopting PX prices as the sole measure of SRAC, before the summer of 2000.

B. The Commission Should Use an Administrative Heat Rate for SCE of 9,705 Btu/kWh rather than 9,140 Btu/kWh.

In choosing the administrative heat rates to be employed by the utilities in the new Market Index Formula, the Alternate PD states that the utilities are to use "the existing administratively determined heat rates pursuant to D.96-12-028."¹⁸ The Alternate PD shows these administrative heat rates as 9,794 Btu/kWh for PG&E, 9,603 Btu/kWh for SDG&E and 9,140 Btu/kWh for SCE. The CCC can accept the values for PG&E and SDG&E; the SCE value, however, is improperly low.

First, contrary to the Alternative PD, the 9,140 Btu/kWh for SCE is not one of "the existing administratively determined heat rates pursuant to D.96-12-028." 9,140 Btu/kWh was the SRAC heat

¹⁵ Attachment RTB-2 of Ex. 103 is the chapter on 2004 intra-zonal congestion costs from the CAISO's *2004 Annual Report*. The CAISO's 2004 energy-related intra-zonal congestion costs totaled \$426 million (see Table 6.7). The utilities introduced exhibits (Ex. 129 and 130) that show lower intra-zonal congestion costs in 2005; the CAISO's *2006 Annual Report* shows that these costs declined to \$222 million and \$207 million in 2005 and 2006 (Table 6.1). Even at \$200 million per year, intra-zonal costs represent a significant adder to the utilities' costs of wholesale purchases. Assuming that the utilities buy no more than 15% of their needs in the wholesale market (Ex. 102, at Table 7), the utilities' market requirements are at most 27,000 GWh annually (i.e. 15% of 180,000 GWh total bundled demand for the three IOUs). Thus, intra-zonal congestion costs add at least \$7.40 per MWh to market prices (\$200 million / 27 million MWh), or raise market heat rates by 1,000 to 1,100 Btu per kWh assuming burnertip gas prices of \$6.70 to \$7.40 per MMBtu. Burnertip gas prices in southern California were \$6.00 per MMBtu in 2004, \$7.86 per MMBtu in 2005, and \$6.82 per MMBtu in 2006, for an average of \$6.89 per MMBtu.

¹⁶ Id. at 28.

¹⁷ Alternate PD at 67.

¹⁸ Alternate PD at 66.

rate adopted by the Commission for in SCE in 1994-1995¹⁹ and employed by the Commission on an interim basis, pending further proceedings, in Decision 01-03-067.²⁰ If the Commission were to employ for SCE the comparable heat rate derived from Decision 96-12-028, as it has done for PG&E and SDG&E, that heat rate would be 10,522 Btu/kWh.²¹

Second, even if one concludes that, in light of Decision 01-03-067, which revised the SCE heat rate formula, that the Decision 96-12-028 value for SCE cited above should not be employed, it does not follow that 9,140 Btu/kWh is the correct value for SCE. Quite the contrary. The 9,140 Btu/kWh value adopted for SCE in Decision 01-03-067 was intended to be temporary and to be replaced with a new heat rate based upon evidence presented in a subsequent hearing. As the Commission stated: "[W]e do not have a sufficient record to update the IER or variable O&M components, so changes to the monthly factor will be subject to possible upward adjustment based upon our review of the IER and variable O&M. . . . In the meantime, the monthly factor shall be calculated using 9,140 Btu/kWh as proposed by SCE."²² The hearings called for in Decision 01-03-067 took place, but the Commission never rendered a decision on the updated heat rate value. As such, this deflated 9,140 Btu/kWh heat rate value has remained in place for more than 6 years, although most QFs entirely avoided application of this value through five year contract amendments with SCE that either contained a set energy price of 5.37 cents/kWh or locked in a heat rate of 9,821 Btu/kWh.²³ As even the Alternate PD itself states, an update to the 9,140 Btu/kWh heat rate value

¹⁹ Ex. 102, Table 1.

²⁰ D.01-03-067 at 13.

²¹ The PG&E and SDG&E administrative heat rates of 9,794 and 9,603 Btu/kWh, respectively, were derived algebraically from the AB 1890 Transition Formulas approved in D. 96-12-028, by re-arranging those formulas into the form:

$$\text{SRAC Energy} = \text{Gas Price} \times \text{Heat Rate} + \text{Adder, where}$$

$$\text{Heat Rate} = [\text{Starting SRAC} \times \text{Factor}] / \text{Starting Gas}$$

$$\text{Adder} = \text{Starting SRAC} \times [1 - \text{Factor}]$$

In SCE's Transition Formula approved in D. 96-12-028, the Starting SRAC is \$20.808/MWh, the Factor is 0.7067, and the Starting Gas is \$1.3975 MMBtu. Using these values in the above Heat Rate formula, the administrative heat rate adopted for SCE in D.96-12-028 is 10,522 Btu/kWh.

²² D.01-03-067, at 13.

²³ D.01-06-015, at 4; D.01-07-031; See also CCC/Beach, Ex. 102, at 23:23-24:3.

was "necessary."²⁴ Given this express acknowledgment that 9,140 Btu/kWh is not the proper measure of SCE's avoided heat rate and that an update to this value is "necessary," it would be wholly improper to use this value in the newly-adopted SRAC formula.²⁵

Third, just comparing the proposed SCE administrative value, 9,140 Btu/kWh, and the proposed PG&E administrative value, 9,794 Btu/kWh, reveals that the SCE value is too low. The record shows that SCE's heat rate should be higher than PG&E's heat rate. This is because the supply/demand balance is significantly tighter in southern California than in the northern California.²⁶

For the appropriate administrative value to be employed in lieu of 9,140 Btu/kWh, the CCC considered a number of alternatives. First, one could simply use the Decision 96-12- 028 value of 10,522 Btu/kWh to be consistent with the methodology adopted for PG&E and SDG&E. Second, one could use the 9,821 Btu/kWh value that was included in the contract amendments between SCE and numerous cogenerators to supplant the 9,140 Btu/kWh value adopted in Decision 01-03-067. Third, one could use for SCE the 9,603 Btu/kWh heat rate that applies to SDG&E given that SCE and SDG&E are participants in the same southern California resource market. Fourth, one could use the average administrative heat rate in effect for SCE under the Transition Formula adopted in Decision 96-12-028 and modified in Decision 01-03-067.

As the best option, the CCC advocates Commission adoption of an administrative heat rate for SCE that is equal to 9,705 Btu/kWh. This value reflects the fourth option discussed above, the average SRAC heat rate employed in SCE's SRAC pricing formula over the 11 years that the Transition Formula has been in effect (October 1996 through September 2007).²⁷ Although not higher than PG&E's heat rate, it is difficult to envision a credible argument that this heat rate is not justifiable

²⁴ Alternate PD at 60.

²⁵ As the Court of Appeal has acknowledged, it would be a violation of PURPA for the Commission to fail correct an erroneous heat rate value. *Southern California Edison Co. V. Public Utilities Comm'n*, 101 Cal.App.4th 982 (2002).

²⁶ The Commission recognized this fact in August 2006, when it directed SCE alone to build 250 MW of new peaking capacity prior to the summer of 2007. See the "Assigned Commissioner's Ruling Addressing Electric Reliability Needs in Southern California for Summer 2007." This relationship is also borne out by comparing NP-15 implied market heat rates to SP-15 implied market prices; the former is generally 200-300 Btu/kWh lower than the latter as exemplified in Table 3 of the Alternate PD.

²⁷ For the first 4.5 years (9/96 to 3/01) the value is 10,522 Btu/kWh and for the remaining 6.5 years (4/01-9/07) the value is 9,140 Btu/kWh, for an average of 9,705 Btu/kWh.

as an administrative heat rate for SCE since the Transition Formula became effective in 1996. This value also most closely corresponds, among the various alternatives, to the Alternate PD's intention to employ the "administratively determined heat rates pursuant to D.96-12-028."

C. The Commission Should Adopt The CCC's Revised TOU Factors For PG&E And SDG&E On An Interim Basis And Reconsider These Values In The Upcoming Technical Workshop.

Agreeing with the CCC and many other parties to this proceeding, the Alternate PD states: "The evidence in this proceeding clearly demonstrates that the TOU/TOD data [for PG&E and SDG&E] is outdated . . . we believe that updating the IOU's TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings is reasonable."²⁸ Despite this clear demonstration that PG&E and SDG&E TOU factors need to be updated, and this reasonable alternative approach, the Alternate PD would do nothing at this time with PG&E's and SDG&E's TOU factors; instead the Alternative PD would defer to the issue to an unspecified "future proceeding."

The Commission should not under-estimate the importance of accurate TOU factors to QFs, utilities and ratepayers. Up-to-date TOU factors will increase SRAC prices in on-peak periods by 40% to 60%, and will reduce SRAC prices in off-peak in other periods by 20%-30%. They will send strong pricing signals to QFs to generate or not to generate. If done correctly, these signals promote system reliability and economic efficiency; if not, they distort the SRAC prices to be received by QFs. As such, it is very important that the Commission not simply defer to an unspecified future proceeding the adjustment of the TOU factors for PG&E and SDG&E.²⁹

It will come as no surprise that the CCC is concerned that, if deferred to a future proceeding, it may take many years to implement new TOU factors. As indicated above, but for the five-year amendments that have now expired, the improperly low, "temporary" heat rate adopted for SCE in Decision 01-03-067 has yet to be addressed. The CCC appreciates the desire of certain parties not to

²⁸ Alternate Decision at 73.

²⁹ Failure to update the admittedly flawed TOU factors also would be in conflict with the ruling of the Court of Appeal that PURPA mandates the correction of erroneous SRAC prices. *Southern California Edison Co. V. Public Utilities Comm'n*, 101 Cal.App.4th 982 (2002).

wait to implement the revised heat rate and other SRAC aspects of the Alternate PD. As such, the CCC proposes a fair compromise.

In particular, the Commission should adopt, on an interim basis, the new TOU factors for SDG&E and PG&E that the CCC proposed in its prepared testimony. These factors are consistent with the E3 avoided cost model that the Commission continues to use for energy efficiency and demand side management programs and are set forth in Table 11 of Exhibit 102 and in the proposed findings of fact contained in Appendix A hereto.³⁰ The Commission should also specify that the utilities may propose alternative TOU factors consistent with those used in their other procurement activities in the technical workshop to be held within 60 days of the effective date of the Alternate PD to implement other aspects of the Alternate PD.³¹ In this way, QFs will not be prejudiced by any delay in addressing the clearly demonstrated need to update these TOU factors.

D. The Commission Should Employ PG&E City-gate Gas Prices, Rather Than A 50/50 Split Between Topock and Malin Border Prices, In PG&E's Burner-tip Gas Price Calculation.

Under the SRAC formula included in both the Alternate PD and the original Proposed Decision, each month the SRAC price is determined by multiplying the SRAC heat rate by a burner-tip gas price, then adding an O&M Adder.³² The CCC agrees that a burner-tip gas price must be employed for the avoided gas cost in the Market Index Formula.³³ This is essentially a reaffirmation of the methodology (called the Modified Transition Formula in the Proposed Decision) adopted for SCE in Decision 01-03-067, and employed for many years previously by the Commission. The

³⁰ CCC/Beach, Ex. 102, at 55 and Table 11. As stated in CCC's opening comments, it is also very important that the utilities not be given carte blanche to develop whatever TOU factors they desire for QF payment purposes. The Commission should permit QF parties to participate in any process relating thereto; a workshop process as advanced by the CCC and TURN in opening comments seems to make the most sense.

³¹ Alternate PD at 137.

³² Alternate PD at 70-71.

³³ In light of the voluminous litigation previously experienced with the minutiae of gas price options, the CCC continues to recommend that the Commission should specify how the burner-tip gas price is to be calculated for each utility.

Alternate PD specifies that the burner-tip gas price for PG&E shall be based on a 50/50 average of the Malin and Topock border price indices (plus intrastate transportation on the PG&E system).³⁴

Consistent with PURPA, the burner-tip gas price used in the SRAC calculation should reflect all of the gas costs incurred by electricity generators in purchasing gas and then transporting it to their burner-tip. The PG&E City-gate market is large, liquid, and best reflects the burner-tip cost of gas to electric generators in northern California.³⁵ The Commission's MPR calculation uses PG&E City-gate prices as the measure of the cost of gas to a new gas-fired combined-cycle generator in northern California.³⁶ The CCC's proposal to use PG&E City-gate prices was not controversial.³⁷ In fact, TURN supports the CCC's proposal.³⁸ There is no evidence that a 50/50 weighting of Malin and Topock border prices is a better representation of electric generators' cost of gas than the PG&E City-gate price. Indeed, the PG&E City-gate is almost assuredly superior – it is a market that is closer to electric generators in northern California, and it reflects the prevailing mix of Canadian and domestic supplies serving the PG&E gas market, including electric generators, at any moment. In contrast, a 50/50 weighting of Malin and Topock prices will only reflect the cost of gas in northern California if that happens to be the mix of Canadian and domestic supplies at that moment, which is highly unlikely.

The arbitrary 50/50 split between Malin and Topock gas prices may have been acceptable in the original PG&E Transition Formula, as that formula relied on these prices only to the extent of the percentage change in the index values over time. In other words, the original Transition Formula used the indices as an escalation index comparing the current price to a starting gas price value; the actual gas price paid by generators and avoided by the utility was not as directly relevant. Under the

³⁴ Alternate PD at 71.

³⁵ CCC/Beach, Ex. 102, at 36.

³⁶ See D.04-06-015, at 18, approving the use of PG&E City-gate gas prices in the MPR calculation.

³⁷ For example, no party has complained that the PG&E City-gate market is not technically located at a California border point and thus might not comply with P.U. Code Section 390(b)'s specification that the SRAC formula should be based on border gas prices. If a party were to make such a complaint, the response is that the Modified Transition Formula adopted in Decision 01-03-067, and used in the Alternate PD, includes the 50/50 mix of Topock and Malin border prices in the GPn and GPbase elements of the formula.

³⁸ TURN Reply Comments on the Proposed Decision, June 4, 2007, at 4 ("In particular, TURN agrees with CCC that 'PG&E City Gate' gas prices should be used in lieu of an arbitrary 50/50 average of border prices at Malin and Topock.")

Market Index Formula, however, the absolute burner-tip gas price to be included in the formula is extremely important and should reflect the appropriate mix of supplies from the Southwest and Canada. This is best done, by far, by using the PG&E City-gate price indices.

Moreover, the use of PG&E City-gate prices in the Market Index Formula does not raise concerns about compliance with P.U. Code Section 390, as the 50/50 mix of Topock and Malin border prices still will be used in the GPn and GPbase elements of the formula. And, as the Court of Appeal has acknowledged, the Commission has considerable latitude in implementing the statutory formula.³⁹ To determine the burnertip price, PG&E should use the City-gate price plus tariffed transportation rates from the Citygate to the burnertip (and applicable surcharges as is done for SCE).

E. The Commission Should Adopt Capacity Prices For Its Prospective QF Program Using Up-To-Date And Realistic Assumptions.

The record in this proceeding was developed in the second half of 2005 and early 2006. Important developments have since occurred, including a substantial escalation in the costs of construction commodities (steel, concrete, copper, etc.) and labor. As a result, some of the capacity-related costs in the record that date from 2003 – 2004 are now clearly outdated. Fortunately, both the Proposed Decision and Alternate PD take official notice of recent Commission decisions, such as the annual determination of the MPR, to update these capacity-related costs. The CCC's comments below focus on how the Alternate PD can be further improved in this respect. In addition, given the technical workshop on implementation issues to be held 60 days from the effective date of this order, the new contracts and capacity prices that will be adopted are highly unlikely to be available to QFs until early 2008. Thus, the capacity prices adopted in this order should be 2008 values.

i. The Alternate PD Sets As-Available Capacity Payments Using Combustion Turbine Costs That Are Far Too Low.

The Proposed Decision includes an as-available capacity price of \$59 per kW-year; the Alternate PD would reduce this price to \$32.50 per kW-year. Both of these values start with TURN's annual fixed costs for a new CT, which are based on a CT capital cost of \$523 per kW and a real

³⁹ *Southern California Edison Co. V. Public Utilities Comm'n*, 101 Cal.App.4th 982 (2002).

economic carrying charge of 9.94%.⁴⁰ TURN's CT capital cost is taken from a 2003 CEC study that is clearly outdated and far too low. As the Commission is well aware, the capital costs for new generating capacity in California have escalated dramatically in recent years.⁴¹ Even though the record in this case dates from the second half of 2005, it does include more recent and more realistic data on CT capital costs than the TURN estimate. For example, the CCC's as-available capacity price calculation used the Commission-approved costs of the actual new CT capacity that SDG&E procured in 2005 (the RAMCO project);⁴² the capital costs for the RAMCO CT were \$747 per kW.⁴³ Making just this one change in TURN's CT cost model, the annual CT cost for 2008 increases to \$96.37 per kW-year.⁴⁴ This short-run capacity value is much more realistic given other measures of CT costs⁴⁵ and of short-term capacity⁴⁶ that the Commission has adopted in recent orders. Thus, the Alternate PD's as-available capacity price should be updated to \$64.77 per kW-year in 2008 (\$96.37 / kW-year less \$14.82 / kW-year in ancillary service revenues less \$16.78 / kW-year in energy rents).

In addition, if the Commission adopts an as-available capacity price based on a real economic carrying charge, escalated for inflation, then it also needs to clarify the escalation rate that will be used to increase the as-available capacity price each year. The Alternate PD fails to specify how to implement this escalation. The CCC has recommended escalation based on the Consumer Price

⁴⁰ TURN/Marcus, Ex. 149, Appendix B, Tables B-1 and B-2.

⁴¹ See Draft Resolution E-4118, released August 23, 2007 in R. 06-02-012 and R. 06-05-027, at 9-11.

⁴² CCC/Beach, Ex. 102, at 51-52.

⁴³ The Commission approved the RAMCO purchase and subsequent increase in the purchase price, in Resolution E-3896 and E-3953. Exhibit B of Attachment 5 of SDG&E's Advice Letter E-1621-E shows RAMCO's capital costs at \$34.0 million; its capacity is 45.51 MW, as stated in Resolution E-3896, at 3. $\$747/\text{kW} = \$34 \text{ million} / 45,510 \text{ kW}$.

⁴⁴ This calculation does not change the RECC factor or the year-to-year escalation rates shown in Table B-2 of TURN's Ex. 149. As a result, the annual CT cost for 2008 shown in Column 18 of Table B-2 (\$67.47/kW) simply increases by the ratio of the CT capital costs, i.e. by \$747/kW divided by \$523/kW.

⁴⁵ As noted in footnote 26 above, in August 2006 the Commission directed SCE to build 250 MW of new peaking capacity. SCE's seventh status report on these peakers, filed April 3, 2007 in R. 06-02-013 and R. 05-12-013, reported the expected cost of these units to be \$275 million, or \$1,100 per kW.

⁴⁶ For example, the Commission recently increased the price that PG&E will offer for demand reductions in the summer of 2007, from \$84 per kW-year to \$108 per kW-year (D. 06-11-049), and Edison's current demand response incentives are \$95.60 to \$103.40 per kW-year (Schedule E-BIP for customers taking service above 50 kV).

Index, but also would support an escalator that is more specific to power plant-related costs, such as the U.S. Army Corps of Engineers index used in the MPR model and recommended by PG&E.⁴⁷

ii. The Commission Should Base the Firm Capacity Price for 10-year, Unit Contingent Firm Capacity Contracts on the Adopted 2007 MPR.

The Alternate PD would adopt a firm capacity price of \$136 per kW-year for the 10-year, unit-contingent firm capacity contract. This price is calculated from the capacity component of the adopted 2006 MPR for a 10-year contract beginning in 2007 (\$157 per kW-year), less \$21 per kW-year in energy savings from the combined-cycle unit on which the MPR is based. The Commission's final decision in this case will not be issued before September 20, 2007, at the earliest. The Alternate PD would provide the utilities with 60 days to develop and file new standard contracts, including the firm unit-contingent contract that will offer the firm capacity price. Thus, it is now certain that the new 10 - year contracts will not be available to QFs until early 2008. Thus, the firm capacity price offered should be for a 10-year contract beginning in 2008, not 2007. Furthermore, the Commission recently issued a draft resolution proposing the 2007 MPR values; the Commission is likely to act on this draft resolution at or soon after the September 20, 2007 Commission business meeting.⁴⁸ Thus, the Commission-adopted MPRs at the time the final order in this case takes effect are highly likely to be the 2007 MPR values, which the Commission also should use in its decision in this case. Thus, the firm capacity price contract should be the adopted 2007 MPR for a 10-year contract beginning in 2007, less \$21 per kW-year in energy savings. Based on the draft resolution on the 2007 MPR, the firm capacity price should be \$155 per kW-year.⁴⁹

⁴⁷ PG&E Reply comments on the Proposed Decision, at 7.

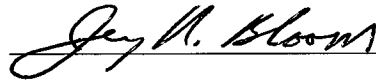
⁴⁸ See Draft Resolution E-4118.

⁴⁹ For a 10-year contract beginning in 2008, the 2008 MPR fixed costs are \$26.38 per MWh, or \$175.63 per kW-year at the adopted capacity factor of 76%. \$176 per kW-year less energy rents of \$21 per kW-year equals \$155 per kW-year. See Draft Resolution E-4118, Appendix A.

III. CONCLUSION

For the reasons set forth above, the Commission should modify and adopt the Alternate PD.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Jerry R. Bloom", is written over a horizontal line.

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Appendix A: Proposed Findings Of Fact And Conclusions Of Law

1. The following Findings of Fact in the Proposed Decision should be changed as set forth below:

Finding of Fact 8. Delete and replace with the following: "It is neither reasonable nor practical to base short-run avoided costs on a traditional "QF-In/QF-Out" pricing methodology because the continuing long-term obligations of thousands of megawatts of QF power mean that QF power cannot be "out".

Finding of Fact 11. Delete and replace with the following: "The evidence supports a finding that the Transition Formula appropriately reflected utility avoided costs since, at least, it was modified in Decision 01-03-067."

Finding of Fact 21. Delete the word "will" and replace it with the word "may".

Finding of Fact 23. Add the words "one-third / two-thirds" before the word "average".

Finding of Fact 29. Delete and replace with the following: "The Commission should adopt the CCC's proposed TOU factors for SDG&E and PG&E, shown on the following table, on an interim basis and consider further TOU factors in the technical workshop to be held within 60 days of this decision."

TOU Period	PG&E		SDG&E	
	<u>Summer</u>	<u>Winter</u>	<u>Summer</u>	<u>Winter</u>
On-peak	1.5554	NA	1.5790	1.2662
Mid-peak	1.1324	1.1494	1.0480	1.1112
Off-peak	0.8816	0.9839	0.8750	0.9731
Super Off-peak	0.5669	0.7175	0.5596	0.7287
Annual Average	1.0000	1.0000	1.0000	1.0000
Seasonal Average	1.0442	0.9551	0.9837	1.0112

Finding of Fact 33. Delete and replace with the following: "QF deliveries are significantly firmer than purchases in the NP15/SP15 day-ahead markets, as QF deliveries are from specified plants, all of the output from which must be sold only to the utilities under contracts that have significant incentives to maximize output; market purchases, however, carry no delivery obligations and generators may pay the CAISO to meet schedules (sometimes for a profit)."

Finding of Fact 36 After "Appendix B," add the words "with an updated CT capital cost equal to the CT cost adopted for SDG&E's RAMCO facility as proposed by CCC."

Finding of Fact 45. Add new text indicated in bold type: "It is reasonable to extend our prospective QF Program contract options to **new QFs and to all existing QFs whose contracts expire, including those** that are, or were, on contract extensions approved in D.02-08-071, D.03-12-062, D.04-01-050, and D.05-12-009."

2. The following new Findings of Fact should be added:

"The 9,140 Btu/kWh heat rate adopted for SCE in D.01-03-067 was intended to be temporary."

"It is reasonable to use an administrative heat rate for SCE of 9,705, which is the average of the market heat rates in SCE's Transition Formula since such formula was implemented in 1996."

"PG&E City-gate gas prices best reflect avoided gas costs in northern California."

"It is reasonable to use PG&E City-gate gas prices in the burner-tip gas price portion of PG&E's Market Index Formula."

3. The following Conclusions of Law in the Proposed Decision should be changed as set forth below:

Conclusion of Law 10. Delete.

Conclusion of Law 17. Add new text indicated in bold type: "A solicitation process wherein the IOUs would issue requests for offers from QF generators to meet specific, identified resource needs, is **insufficient in today's market** to meet the must purchase obligation of PURPA."

Conclusion of Law 19. Add new text indicated in bold type: "The prospective QF Program contract options should be extended to **new QFs and to all existing QFs whose contracts expire, including those** that are, or were, on contract extensions approved in D.02-08-071, D.03-12-062, D.04-01-050, and D.05-12-009."

4. The following new Conclusions of Law should be added:

"There is no need under PURPA to revise SRAC payments previously made under RSO1 contracts."

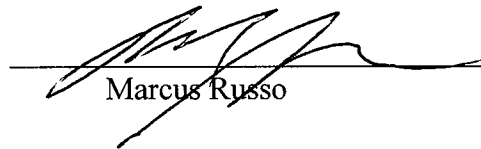
Certificate of Service

I hereby certify that I have this day served a copy of the

Comments of the California Cogeneration Council on the Alternate Proposed Decision of Commissioner Grueneich

on all known parties to R.04-04-003 and R.04-04-025 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on September 10, 2007, at San Francisco, California.



Marcus Russo

CALIFORNIA PUBLIC UTILITIES COMMISSION

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